

Joshua Taylor <jmtaylor0@yahoo.com>
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To: Comments-northern-nezperce-red-river@fs.fed.us
cc:
Subject: Red pines logging proposal comments

October 11, 2004

Comments on the Red Pines Logging Proposal

Dear Mr. Williams,

Thank you for taking the time to review these comments. A critical component of managing public lands is the ability of supervisors to adequately consider and scrutinize comments that the public offers. The Forest Service has shown a strong history of working with and cooperating with public sentiment and concerns for national forest lands. This is greatly appreciated and admired.

Of concern in these comments are the areas outlined under and affected by the Red Pines logging proposal. While I am not against all logging and extraction on public lands, I certainly am against such proposals that may adversely impact and create long-term damage, especially in places that have historically been intensely managed for extraction. Of great concern here is the water quality of the South Fork Clearwater River and its many tributaries, one of which is the Red River. The forest plan created guidelines and standards for improving water quality. However, the DEIS indicates that water quality standards would have to be amended and weakened in order that the logging project would be tolerated and allowed. This seems very hypocritical and disturbing. Not only would this allow further degradation to occur, but if logging were to occur, much aquatic habitat destruction would occur, frustrating much of the public whom own this land. The Nez Perce Tribe has been for years trying to restore this watershed by implementing stricter standards for water quality. Habitat for steelhead, salmon, and bull trout have already been made vulnerable by human impacts and activities that have occurred. With that said, the cumulative impacts of the future activities must not only be analyzed, but also must be disclosed to the public.

Response 2-1 Comment Acknowledged.

Response 2-2 Water quality, upward trend.

The USFS recognizes the below-objective conditions of these watersheds. The aquatic trend analysis in Appendix H of the FEIS is the documentation leading to the conclusion that an upward trend in aquatic condition is predicted in the long term for many subwatersheds under Alternatives B, C and D and for all subwatersheds under Alternative E. This analysis takes into account the positive and negative effects of the project activities in the short and long term. A detailed upward trend analysis for each subwatershed is located in the Red Pines Analysis file.

Response 2-3 Cumulative effects. The cumulative effects discussion was supplemented with additional analysis in the FEIS, see Section 3.2 Cumulative Effects. Cumulative effects analysis for each resource areas has also been supplemented. .

Another part of the proposal that draws serious concern is that of the 25 to 36 miles of new roads that would affect almost 4000 acres of land to logging, all under the pretense of fire protecting and bug prevention. However, Forest Service research has already shown that logging is a cause of creating fire-prone conditions. Not only does the forest floor become drier from less canopy cover, but more fuel would be brought to the floor. Slash removal does help mitigate these effects, but so often slash removal is not considered, and when it is, it seems that funding usually seems to run out before implementation can happen. New roads also impact water quality by increasing sediment through increased runoff and erosion.

To conclude, it would be recommended that a variety of other alternatives be proposed that do not implement logging to reach the desired state of forest health.

Also, the alternatives must indicate how the watershed's soil, water, and wildlife habitat would be improved such that the Nez Perce National Forest Land and Resource Management Plan would be followed.

Sincerely,

Joshua Taylor
204 N. Adams St., #1
Moscow, Idaho 83843
(208) 596-4500

Response 2-4 Roads/ Fuels/Water quality.

See also response 1-3 regarding new roads in the watershed. These roads would be temporary.

It is acknowledged that the short-term risk of a high severity wildfire is possible between the time of the vegetation treatment and the slash disposal is completed. The long term benefits of the treatments, modified fire behavior and lower future fuel loadings, outweigh the short term risk. Additionally after the slash disposal is completed the fuel loadings within the treatment units will be less than 12 tons per acre. If the treatments are not completed and stands continue to transition to Fuel Model 10 and 13 we would see fuel loadings in excess of 12 tons per acre.

The areas of sufficient size and location to satisfy the Purpose and Need of the project are not readily accessible. They cannot be reached from the existing road system. The fuels reduction portion of the project is focused primarily on removing dead, down, and dying lodgepole pine, which must be removed in quantities and at locations sufficient to create the fuel breaks necessary to achieve the project objectives.

Although this material is of relatively low commercial value, any revenue generated from timber will be used for the proposed watershed restoration activities. We should emphasize that all temporary roads constructed as part of this project would be decommissioned within three years following their construction.

The areas available for prescribed treatment activities that are accessible from existing roads are insufficient in size or location to satisfy the project's fuel reduction objectives.

We acknowledge that roads can have an impact on water quality. These effects are disclosed in Chapter III of the FEIS. No new, permanent roads would be constructed as part of this project. In addition, all temporary roads constructed would be decommissioned within three years following their construction, thus minimizing their long term effects.

Response 2-5 Alternatives/Forest Plan Consistency

The range of alternatives was developed in response to the Purpose and Need and issues identified through scoping. A new alternative, Alternative E, was developed in response to comments of the DEIS. The FEIS describes Alternative E and discloses the potential effects to each resource area. (Refer to FEIS, Chapters I, II, III).

Response 2-6. Forest Plan consistency. The sections titled Consistency with the Forest Plan and Environmental Law was supplemented for each resource section in the FEIS. See soils (3.4.7), water quality (3.5.10), and wildlife (3.12.9) sections in the FEIS.